Bayside Community Hospital & Clinic

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February 4, 2004

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street Washington, DC 20554

Re: WC Docket No. 02-60

Dear Ms. Dortch:

I am writing to share our perspective on the current initiatives relative to defining/redefining what is "rural."

It is our opinion that current definitions utilized for the purposes of inclusion in the programs offered under the Universal Support Service are highly restrictive and exclude many areas that would otherwise be considered rural. Under the current definition/application we are excluded from participating in the program, yet many who visit us here in Anahuac, Texas find us to be one of the most isolated and remote places they have ever been. Our demography, geography and topography are factors in a number of current designations including MUA, HPSA, NHSC and the Critical Access designation for our hospital.

We strongly support and urge adoption of the addition of the "Rural Urban Commuting Area" system, as employed by the ORHP, in identifying entities and organizations eligible for funding under the program.

Thank you for your consideration.

Respectfully submitted,

Robert A. Pascasio, CHE Administrator/CEO